

VIRGINIA:

IN THE CIRCUIT COURT OF RUSSELL COUNTY

PATRICIA A. PLASTER

PLAINTIFF

VS: **COMPLAINT**

CL 20-379

**WALMART, INC.
WALMART STORES, INC.
WAL-MART STORES EAST, LP
c/o REGISTERED AGENT:
CT CORPORATION
4701 Cox Road, Suite 285
Glen Allen, VA 23060-6808**

DEFENDANT

TO THE HONORABLE MICHAEL L. MOORE, JUDGE OF THE CIRCUIT COURT OF
RUSSELL COUNTY, VA:

Your Plaintiff states as follows:

1.

Defendant, Wal-Mart Stores, Inc. (operating as Wal-Mart Stores East, LP), is a foreign corporation which at all material times conducted business in the Commonwealth of Virginia.

2.

On or about March 20, 2018, Wal-Mart Stores, Inc. was the owner and operator of a Wal-Mart Store known as Wal-Mart Stores East, LP, in Lebanon, Virginia.

On March 20, 2018, Plaintiff went into Defendant's premises at 1050 Regional Park Road, Lebanon, Virginia to shop. She was caused to slip and fall as a result of water or some other transitory substance on the floor at the end of Aisle 8.

Exhibit A

Defendant knew, or, in the exercise of reasonable care should have known, of the Condition, or Defendant created the condition, either through the acts of its employees, or in its negligent method of operation, and Defendant should have corrected the condition or warned Plaintiff of its existence. Additionally, Defendant should have had non-slip surface which would have prevented the fall which resulted from a foreseeable condition.

3.

The Defendant had a duty of care to Plaintiff and other customers to provide a safe environment for shopping. Defendant was negligent in performing its duty of care. The Defendant breached its duty and the Plaintiff suffered injuries as a result of Defendant's negligence.

4.

Plaintiff suffered injuries to her right knee and lower back from said fall; the injuries have continued to require medical treatment, physical therapy and medication. Plaintiff has continued to have pain and suffering from the fall.

As a result of the negligence of the Defendant, Plaintiff suffered permanent bodily injury, and resulting pain and suffering, mental anguish, loss of the capacity for the enjoyment of life, and medical expenses.

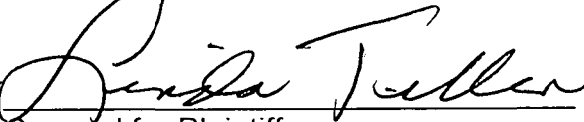
WHEREFORE, the Plaintiff, Patricia A. Plaster, demands judgment for compensatory damages against the Defendant in the amount of \$50,000.00, and further demands a trial by jury of all issues.

PATRICIA A. PLASTER

By Counsel

TILLER and TILLER, P.C.
Attorneys at Law
P. O. Box 466
Lebanon, VA 24266

BY

A handwritten signature in black ink, appearing to read "Linda Tiller", is written over a horizontal line.

Counsel for Plaintiff